

1 **TERRY GODDARD**  
2 **Attorney General**  
3 **JOHN R. EVANS**  
4 **Assistant Attorney General**  
5 400 West Congress, Suite S-315  
6 Tucson, Arizona 85701  
7 Telephone No.: (520) 628-6504  
8 Pima County Computer No.: 17088  
9 Arizona State Bar No.: 5797  
10 T002-2010-000027

11 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**  
12 **IN AND FOR THE COUNTY OF COCHISE**

13 **STATE OF ARIZONA,**

14 **Plaintiff,**

15 **vs.**

16 **ANGELICA MARIE BORQUEZ (001),**  
17 **IGNACIO ALFREDO ERIVES-MARTINEZ (002)**  
18 **AKA HACHA,**

19 **Defendants**

**GJ#**

**INDICTMENT**

**Cause No. CR2010-00038**

**Cause No. CR2010-00039**

**(Judge Hoggatt)**

20 The grand jurors of the County of Cochise, in the name of the State of Arizona, and by its  
21 authority accuse **ANGELICA MARIE BORQUEZ and IGNACIO ALFREDO ERIVES-**  
22 **MARTINEZ aka HACHA** and charge that in Cochise County:

23 **COUNT 1: CONSPIRACY, a Class 2 Felony**

24 From on or about the 5<sup>th</sup> day of November, 2008 to January, 2010, **ANGELICA**  
25 **MARIA BORQUEZ and IGNACIO ALFREDO ERIVES-MARTINEZ AKA HACHA** and  
26 others unknown agreed with each other to commit the crimes of fraudulent schemes and artifices,  
27 participating in a criminal syndicate, assisting a criminal syndicate, illegal use of a wire  
28 communication in furtherance of a felony, and transportation of marijuana for sale and in  
furtherance of the plan overt acts were committed including but not limited to the following:

At all times relevant **ANGELICA MARIA BORQUEZ** was an employee of the Cochise

County Attorney as a secretary with the drug unit.

At all time relevant **IGNACIO ALFREDO ERIVES-MARTINEZ** was associated with a drug trafficking organization.

1. On November 5, 2008, at approximately 10:30, call 1858, **IGNACIO ALFREDO ERIVES-MARTINEZ AKA HACHA** called **ANGELICA MARIA BORQUEZ** and discussed who had been arrested in Cochise County and was involved in a chase with police. **IGNACIO ALFREDO ERIVES-MARTINEZ AKA HACHA** asked **ANGELICA MARIA BORQUEZ** to deliver a copy of the police reports to him and **ANGELICA MARIA BORQUEZ** agreed.
2. On November 5, 2008, at approximately 15:21, call 1872, **IGNACIO ALFREDO ERIVES-MARTINEZ AKA HACHA** called **ANGELICA MARIA BORQUEZ** at the Cochise County Attorney's office and asked whether information regarding an arrest was available. **ANGELICA MARIA BORQUEZ** said she did not have it yet, but there was still a chance it would arrive.
3. On November 5, 2008, at approximately 16:57, call 1882, **IGNACIO ALFREDO ERIVES-MARTINEZ AKA HACHA** called **ANGELICA MARIA BORQUEZ** and asked about the requested information. **ANGELICA MARIA BORQUEZ** said she would bring what she had.
4. On November 6, 2008, at approximately 13:20, call 1961, **IGNACIO ALFREDO ERIVES-MARTINEZ AKA HACHA** called **ANGELICA MARIA BORQUEZ**. **ANGELICA MARIA BORQUEZ** said the reports were with the attorney and she would get a copy and deliver them to **IGNACIO ALFREDO ERIVES-MARTINEZ AKA HACHA**.
5. On December 3, 2008, at approximately 14:24, call 5617, **IGNACIO ALFREDO ERIVES-MARTINEZ AKA HACHA** called **ANGELICA MARIA BORQUEZ** and asked where "Perico" was being held. **ANGELICA MARIA BORQUEZ** said he was being held in Bisbee on a \$15,000 bond. **ANGELICA MARIA BORQUEZ** told **IGNACIO ALFREDO ERIVES-MARTINEZ AKA HACHA** she was not going to post bail for "Perico". She further explained he was not being held under his real name but the name Luis Carlos Rodriquez.
6. On December 9, 2008, at approximately 17:37, call 6504, **ANGELICA MARIA BORQUEZ**, using the cell phone used primarily by **IGNACIO ALFREDO ERIVES-MARTINEZ AKA HACHA**, called the U.S. Border Patrol station and asked if there was any public listing of people who were deported.
7. On December 14, 2008 at approximately 13:19, call 7025, **IGNACIO ALFREDO**

1 **ERIVES-MARTINEZ AKA HACHA** called "Felipe" and asked him to bring \$100 so  
2 **ANGELICA MARIA BORQUEZ** could get her job done for him.

3 8. On December 15, 2008 at approximately 11:26, call 7086, **IGNACIO ALFREDO**  
4 **ERIVES-MARTINEZ AKA HACHA** called **ANGELICA MARIA BORQUEZ** and  
5 asked about the U.S. Border Patrol stop. **IGNACIO ALFREDO ERIVES-**  
6 **MARTINEZ AKA HACHA** said he would give her \$50 when she delivered the papers  
7 about the stop. **ANGELICA MARIA BORQUEZ** said she would check.

8 9. On December 16, 2008, at approximately 11:50, call 6, "Perico" called **ANGELICA**  
9 **MARIA BORQUEZ** and asked if anything had been found. **ANGELICA MARIA**  
10 **BORQUEZ** said no. **IGNACIO ALFREDO ERIVES-MARTINEZ AKA HACHA**  
11 instructed **ANGELICA MARIA BORQUEZ** to look where she found the record for  
12 "Eric" and "Tomato".

13 10. On December 16, 2008, at approximately 15:36, call 21, "Perico" called **ANGELICA**  
14 **MARIA BORQUEZ** and asked if anything had come up regarding "Diego".  
15 **ANGELICA MARIA BORQUEZ** said No. "Perico" said he thinks "Diego" is in  
16 Wilmot, because he was caught by Border Patrol. **ANGELICA MARIA BORQUEZ**  
17 said she is really busy and will do it once she gets a chance.

18 11. On December 17, 2008 at approximately 11:47, call 90, **IGNACIO ALFREDO**  
19 **ERIVES-MARTINEZ AKA HACHA** called **ANGELICA MARIA BORQUEZ** and  
20 asked whether the papers for "Diego" have arrived. **ANGELICA MARIA BORQUEZ**  
21 said that they have not. She explains that law enforcement has until the 18<sup>th</sup> to file the  
22 paper work for the charges to proceed. **IGNACIO ALFREDO ERIVES-MARTINEZ**  
23 **AKA HACHA** said get the "papers for both".

24 All in violation of A.R.S. ' ' 13-1003, 13-2310, 13-2308, 13-3417, 13-3405, 13-603, 13-  
25 701, 13-702, 13-703, 13-801, 13-804 and 13-811, 13-2313, 13-2314.

26 **COUNT 2: FRAUDULENT SCHEMES AND ARTIFICES, A Class 2 Felony**

27 From on or about the 5<sup>th</sup> day of November, 2008 to January, 2010, **ANGELICA**  
28 **MARIA BORQUEZ and IGNACIO ALFREDO ERIVES-MARTINEZ AKA HACHA**  
pursuant to a scheme to deprive the Cochise County Attorney of the intangible right to honest  
services, knowingly obtained any benefit, to wit: money, by means of false or fraudulent pretenses,  
representations, promises or material omissions in violation of A.R.S. §§ 13-2310, 13-301, 13-303,



13-603, 13-701, 13-702, 13-702.02, 13-703, 13-801, 13-804, 13-811, 13-2313, 13-2314.

**COUNT 3: PARTICIPATING IN A CRIMINAL SYNDICATE, A Class 2 Felony**

From on or about the 5<sup>th</sup> day of November, 2008 to January, 2010, **ANGELICA MARIA BORQUEZ**, a public servant, **and IGNACIO ALFREDO ERIVES-MARTINEZ AKA HACHA** committed participating in a criminal syndicate by intentionally promoting or furthering the criminal objectives of a criminal syndicate by inducing or committing any act or omission by a public servant in violation of her official duty, in violation of A.R.S. §§ 13-2308, 13-2301, 13-301, 13-303, 13-603, 13-701, 13-702, 13-702.02, 13-703, 13-801, 13-804, 13-811, 13-2313, 13-2314.

**COUNT 4: UNLAWFUL USE OF A WIRE COMMUNICATION TO FACILITATE A FELONY, a Class 4 Felony**

On November 5, 2008, at approximately 10:30, **IGNACIO ALFREDO ERIVES-MARTINEZ AKA HACHA** and **ANGELICA MARIA BORQUEZ** unlawfully used a wire communication using telephone number [REDACTED] (call number 1858) to facilitate the violation of any felony provision or to conspire to commit any felony provision of Chapters 34 and/or 23 of Title 13, to wit: A.R.S. § 13-1003, Conspiracy; and/or A.R.S. § 13-2310, Fraudulent Schemes and Artifices; and/or A.R.S. § 13-2308, Participating in a Criminal Syndicate; and/or A.R.S. § 13-3405, Transportation of Marijuana for Sale, in violation of A.R.S. §§ 13-3417(A) & (C); 13-3401; 13-301; 13-303; 13-603; 13-604; 13-701; 13-702, 13-702.02, 13-703 and 13-801.

**COUNT 5: UNLAWFUL USE OF A WIRE COMMUNICATION TO FACILITATE A FELONY, a Class 4 Felony**

On November 5, 2008, at approximately 15:21, **IGNACIO ALFREDO ERIVES-MARTINEZ AKA HACHA** and **ANGELICA MARIA BORQUEZ** unlawfully used a wire communication using telephone number [REDACTED] (call number 1872) to facilitate the

1 violation of any felony provision or to conspire to commit any felony provision of Chapters 34  
2 and/or 23 of Title 13, to wit: A.R.S. § 13-1003, Conspiracy; and/or A.R.S. § 13-2310, Fraudulent  
3 Schemes and Artifices; and/or A.R.S. § 13-2308, Participating in a Criminal Syndicate; and/or  
4 A.R.S. § 13-3405, Transportation of Marijuana for Sale, in violation of A.R.S. §§ 13-3417(A) &  
5 (C); 13-3401; 13-301; 13-303; 13-603; 13-604; 13-701; 13-702, 13-702.02, 13-703 and 13-801.

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7 **COUNT 6: UNLAWFUL USE OF A WIRE COMMUNICATION TO  
FACILITATE A FELONY, a Class 4 Felony**

8 On November 5, 2008, at approximately 16:57, **IGNACIO ALFREDO ERIVES-**  
9 **MARTINEZ AKA HACHA** and **ANGELICA MARIA BORQUEZ** unlawfully used a wire  
10 communication using telephone number [REDACTED] (call number 1882) to facilitate the  
11 violation of any felony provision or to conspire to commit any felony provision of Chapters 34  
12 and/or 23 of Title 13, to wit: A.R.S. § 13-1003, Conspiracy; and/or A.R.S. § 13-2310, Fraudulent  
13 Schemes and Artifices; and/or A.R.S. § 13-2308, Participating in a Criminal Syndicate; and/or  
14 A.R.S. § 13-3405, Transportation of Marijuana for Sale, in violation of A.R.S. §§ 13-3417(A) &  
15 (C); 13-3401; 13-301; 13-303; 13-603; 13-604; 13-701; 13-702, 13-702.02, 13-703 and 13-801.

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18 **COUNT 7: UNLAWFUL USE OF A WIRE COMMUNICATION TO  
FACILITATE A FELONY, a Class 4 Felony**

19 On November 6, 2008, at approximately 13:20, **IGNACIO ALFREDO ERIVES-**  
20 **MARTINEZ AKA HACHA** and **ANGELICA MARIA BORQUEZ** unlawfully used a wire  
21 communication using telephone number [REDACTED] (call number 1961) to facilitate the  
22 violation of any felony provision or to conspire to commit any felony provision of Chapters 34  
23 and/or 23 of Title 13, to wit: A.R.S. § 13-1003, Conspiracy; and/or A.R.S. § 13-2310, Fraudulent  
24 Schemes and Artifices; and/or A.R.S. § 13-2308, Participating in a Criminal Syndicate; and/or  
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1 A.R.S. § 13-3405, Transportation of Marijuana for Sale, in violation of A.R.S. §§ 13-3417(A) &  
2 (C); 13-3401; 13-301; 13-303; 13-603; 13-604; 13-701; 13-702, 13-702.02, 13-703 and 13-801.

3 **COUNT 8: UNLAWFUL USE OF A WIRE COMMUNICATION TO**  
4 **FACILITATE A FELONY, a Class 4 Felony**

5 On December 3, 2008, at approximately 14:24, **IGNACIO ALFREDO ERIVES-**  
6 **MARTINEZ AKA HACHA** and **ANGELICA MARIA BORQUEZ** unlawfully used a wire  
7 communication using telephone number [REDACTED] (call number 5617) to facilitate the  
8 violation of any felony provision or to conspire to commit any felony provision of Chapters 34  
9 and/or 23 of Title 13, to wit: A.R.S. § 13-1003, Conspiracy; and/or A.R.S. § 13-2310, Fraudulent  
10 Schemes and Artifices; and/or A.R.S. § 13-2308, Participating in a Criminal Syndicate; and/or  
11 A.R.S. § 13-3405, Transportation of Marijuana for Sale, in violation of A.R.S. §§ 13-3417(A) &  
12 (C); 13-3401; 13-301; 13-303; 13-603; 13-604; 13-701; 13-702, 13-702.02, 13-703 and 13-801.

14 **COUNT 9: UNLAWFUL USE OF A WIRE COMMUNICATION TO**  
15 **FACILITATE A FELONY, a Class 4 Felony**

16 On December 14, 2008, at approximately 13:19, **IGNACIO ALFREDO ERIVES-**  
17 **MARTINEZ AKA HACHA** unlawfully used a wire communication using telephone number [REDACTED]  
18 [REDACTED] (call number 7025) to facilitate the violation of any felony provision or to conspire to  
19 commit any felony provision of Chapters 34 and/or 23 of Title 13, to wit: A.R.S. § 13-1003,  
20 Conspiracy; and/or A.R.S. § 13-2310, Fraudulent Schemes and Artifices; and/or A.R.S. § 13-2308,  
21 Participating in a Criminal Syndicate; and/or A.R.S. § 13-3405, Transportation of Marijuana for  
22 Sale, in violation of A.R.S. §§ 13-3417(A) & (C); 13-3401; 13-301; 13-303; 13-603; 13-604; 13-  
23 701; 13-702, 13-702.02, 13-703 and 13-801.

26 **COUNT 10: UNLAWFUL USE OF A WIRE COMMUNICATION TO**  
27 **FACILITATE A FELONY, a Class 4 Felony**



1 On December 15, 2008, at approximately 11:26, **IGNACIO ALFREDO ERIVES-**  
2 **MARTINEZ AKA HACHA** and **ANGELICA MARIA BORQUEZ** unlawfully used a wire  
3 communication using telephone number [REDACTED] (call number 7086) to facilitate the  
4 violation of any felony provision or to conspire to commit any felony provision of Chapters 34  
5 and/or 23 of Title 13, to wit: A.R.S. § 13-1003, Conspiracy; and/or A.R.S. § 13-2310, Fraudulent  
6 Schemes and Artifices; and/or A.R.S. § 13-2308, Participating in a Criminal Syndicate; and/or  
7 A.R.S. § 13-3405, Transportation of Marijuana for Sale, in violation of A.R.S. §§ 13-3417(A) &  
8 (C); 13-3401; 13-301; 13-303; 13-603; 13-604; 13-701; 13-702, 13-702.02, 13-703 and 13-801.  
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11 **COUNT 11: UNLAWFUL USE OF A WIRE COMMUNICATION TO**  
12 **FACILITATE A FELONY, a Class 4 Felony**

13 On December 16, 2008, at approximately 11:50, **IGNACIO ALFREDO ERIVES-**  
14 **MARTINEZ AKA HACHA** and **ANGELICA MARIA BORQUEZ** unlawfully used a wire  
15 communication using telephone number [REDACTED] (call number 6) to facilitate the violation  
16 of any felony provision or to conspire to commit any felony provision of Chapters 34 and/or 23 of  
17 Title 13, to wit: A.R.S. § 13-1003, Conspiracy; and/or A.R.S. § 13-2310, Fraudulent Schemes and  
18 Artifices; and/or A.R.S. § 13-2308, Participating in a Criminal Syndicate; and/or A.R.S. § 13-3405,  
19 Transportation of Marijuana for Sale, in violation of A.R.S. §§ 13-3417(A) & (C); 13-3401; 13-301;  
20 13-303; 13-603; 13-604; 13-701; 13-702, 13-702.02, 13-703 and 13-801.  
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22 **COUNT 12: UNLAWFUL USE OF A WIRE COMMUNICATION TO**  
23 **FACILITATE A FELONY, a Class 4 Felony**

24 On December 16, 2008, at approximately 15:36, **ANGELICA MARIA BORQUEZ**  
25 unlawfully used a wire communication using telephone number [REDACTED] (call number 21) to  
26 facilitate the violation of any felony provision or to conspire to commit any felony provision of  
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1 Chapters 34 and/or 23 of Title 13, to wit: A.R.S. § 13-1003, Conspiracy; and/or A.R.S. § 13-2310,  
2 Fraudulent Schemes and Artifices; and/or A.R.S. § 13-2308, Participating in a Criminal Syndicate;  
3 and/or A.R.S. § 13-3405, Transportation of Marijuana for Sale, in violation of A.R.S. §§ 13-  
4 3417(A) & (C); 13-3401; 13-301; 13-303; 13-603; 13-604; 13-701; 13-70213-702.02, 13-703 and  
5 13-801.

6  
7 **COUNT 13: UNLAWFUL USE OF A WIRE COMMUNICATION TO  
FACILITATE A FELONY, a Class 4 Felony**

8 On December 17, 2008, at approximately 11:47, **IGNACIO ALFREDO ERIVES-**  
9 **MARTINEZ AKA HACHA** and **ANGELICA MARIA BORQUEZ** unlawfully used a wire  
10 communication using telephone number [REDACTED] (call number 90) to facilitate the violation  
11 of any felony provision or to conspire to commit any felony provision of Chapters 34 and/or 23 of  
12 Title 13, to wit: A.R.S. § 13-1003, Conspiracy; and/or A.R.S. § 13-2310, Fraudulent Schemes and  
13 Artifices; and/or A.R.S. § 13-2308, Participating in a Criminal Syndicate; and/or A.R.S. § 13-3405,  
14 Transportation of Marijuana for Sale, in violation of A.R.S. §§ 13-3417(A) & (C); 13-3401; 13-301;  
15 13-303; 13-603; 13-604; 13-701; 13-702, 13-702.02, 13-703 and 13-801.  
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18 **ED RHEINHEIMER**  
19 **COCHISE COUNTY ATTORNEY**

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21 By: **JOHN R. EVANS**  
*Assistant Attorney General*

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23 **FOREPERSON OF THE GRAND JURY**

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